

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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MARIA UMALA and ALICIA BATISTA,  
*on behalf of themselves, FLSA Collective Plaintiffs*  
*and the Class,*

Case No. 20-01176

Plaintiff,

-against-

OFFER OF JUDGMENT

SKYLIGHT HOLDINGS INC.  
d/b/a FOOD UNIVERSE MARKETPLACE,  
SKYLIGHT HOLDINGS 2 INC.  
d/b/a FOOD UNIVERSE MARKETPLACE,  
SKYLIGHT HOLDINGS 4 INC.  
d/b/a KEY FOOD MARKETPLACE,  
MET-SUNNYSIDE, INC.  
d/b/a FOOD UNIVERSE MARKETPLACE and  
PEDRO GOICO, JUAN PEREZ,  
and HONG SIK CHOI, Defendants.  
-----X

To: CK Lee, Esq.  
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Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants offer to allow Judgment to be entered in favor of both Plaintiffs in this action in the aggregate amount of \$110,000.00, inclusive of all of Plaintiffs' claims for relief set forth in both the Complaint and as set forth in the Plaintiffs' proposed Amended Complaint as set forth in the Plaintiffs' Motion dated April 8, 2022, attorney's fees, and any and all costs involved in the litigation. This offer of judgment is made for the purposes specified in Federal Rule of Civil Procedure 68, and is not to be construed as either an admission that Defendant is liable in this action, or that Plaintiff has suffered any damage. This Offer of Judgment shall not be filed with the Court unless (a) accepted or (b) in a proceeding to determine costs. If Plaintiff does not accept this offer in writing within fourteen days after service, then Defendants' offer shall be deemed withdrawn in accordance with Rule 68(b). If Plaintiff does not accept this offer, he may become obligated to pay Defendants' attorney's fees and costs incurred after making this offer.

Dated: New York, New York  
April 19, 2022

Respectfully Submitted,

KIDONAKIS & CORONA, PLLC

*Gregory Capone*

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Gregory Capone, Esq.

Attorney for Defendants

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon Plaintiffs' counsel via email and first-class mail on April 19, 2022.

  
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Gregory Capone, Esq.